Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses

Comment No.	Comment Summary	Comment Response
1	A commenter pointed out that the definition of POM used in the 112(c)(6) inventory was different than the definition for POM used in the Clean Air Act. The commenter suggested that more language be added to Chapter 1 of the report to explain this difference.	Additional text was added to Chapter 1 of the final inventory report to better highlight the difference in POM definitions, explain why this difference occurs, and point the reader to the specific sections of Chapter 3 in the report where the topic is addressed in detail.
2	A commenter expressed concern that in the POM discussion, the report implied that emissions estimates (for POM surrogates such as EOM and 16-PAH) can be correlated with risk to the population. The comment recommended that the sentence in question be changed to indicate that EOM or 16-PAH based emission estimates can be used to characterize POM emissions, and delete all references to risk.	EPA agreed with the comment and the sentence was changed in the final report to delete the reference to risk and risk correlations.

Comment No.	Comment Summary	Comment Response
3	A commenter requested that naphthalene be excluded from the definition of POM used for this inventory. The comment indicated that naphthalene should be listed and inventoried separately from the rest of POM.	EPA was not able to make the requested change for naphthalene in the final inventory. One of the POM definitions that was used in the inventory, 16-PAH, included naphthalene and all final emission estimates for 16-PAH address naphthalene where it was found to be a constituent. The manner in which EPA is defining POM for the purposes of the 112(c)(6) inventory includes naphthalene. Naphthalene alone is not a 112(c)(6) pollutant; and therefore, it would not be appropriate to include it in the inventory as a separate pollutant. At this time, EPA has not made a final determination on whether it will modify the POM definition contained in the Clean Air Act; therefore, it would not be appropriate to separate out naphthalene from what is defined as POM.
4	A commenter objected to the assumption used in the inventory report for calculating emissions on the basis of major/area source status that all primary copper smelters were major sources. The commenter indicated that this determination had not been made for sources in the state where it resides. The comment suggested that the assumption used in the report would determine how copper smelters would be evaluated by regulatory authorities for defining major source status.	The calculational assumption used in the draft report that all primary copper smelters are major sources was not changed in the final report. The assumption of 100% major sources has no bearing on any source status determination that may be made by EPA or a state for regulatory purposes such as operating permits, new source review (NSR) determinations, etc. The 100% major assumption for the category was simply a means (for the purposes of 112c6) to estimate the amount of emissions nationally that were either major or area source oriented. No quantitative data were provided during the comment phase to indicate that a major /area split for copper smelters different from 100% major was correct.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
5	A commenter objected to the use of 7-PAH, 16-PAH, and EOM as surrogate definitions for estimating emissions for POM. The commenter stated that none of these surrogates were consistent with the Clean Air Act POM definition and are not an adequate measure of POM emissions from a source.	As discussed in the inventory report, EPA is currently in the process of re-evaluating the issue of how to define POM. The Agency chose to use the 7-PAH, 16-PAH, and EOM surrogates for the purposes of the 112(c)(6) inventory while this evaluation is in progress. If the definition in the Act is modified, it may be necessary in the future to re-examine the estimates in the final 112(c)(6) inventory and adjust them accordingly. However, in order to meet several mandates it is facing on section 112(c)(6), EPA has decided to produce inventory estimates using the POM surrogates of 7-PAH, 16-PAH, and EOM. No final decision has been made by the Agency on which POM surrogate definition to ultimately use for 112(c)(6) analysis purposes. However, it is doubtful an EOM definition can be applied since there are several categories with no or very poor quality EOM estimates.
6	Several comments were received indicating that the information on which the HCB emission estimates for pesticides application were based were incorrect. The primary data that were incorrect were the levels of HCB contamination in the final pesticide products that were applied and the assumption that 100% of the applied HCB is emitted to the air. Improved information was supplied for the HCB content levels and an improved data set on HCB fate in the environment was provided. The new fate data indicated that only 8.4% of the applied HCB ends up as an air release.	Based on a review and concurrence by EPA's Office of Prevention, Pesticides, and Toxic Substances, the data provided by the commenters were used to recalculate all of the HCB emission estimates for pesticides application. The HCB emission estimate for this category was significantly reduced in the final report from what it was in the draft inventory.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
7	Several comments were expressed questioning the use of a 1990 baseline for emission estimates, voicing a desire to have the inventory show current emission levels to demonstrate significant reductions since 1990, and asking for clarification on what estimate values were for 1990 and which were not.	Language in the inventory document discussing the use of a 1990 base year was expanded to clarify that the Clean Air Act was the basis for this decision. EPA has to have a base year for comparison to evaluate the effectiveness of various programs and the most recent year of enactment was the time period the Agency uses for consistency. To address the issue of categories with significantly reduced emissions since 1990, additional information was put in the final inventory report to indicate the categories where large emission reductions had taken place since 1990 due principally to the development of MACT standards. In several instances 1995 or 1996 emission values were provided along with the 1990 estimates to show the reductions made by the source categories. To better understand what data were for 1990, language was added to the entire document text and tables to more clearly denote a 1990 base year estimate.
8	One commenter submitted new information for the calculation of PCB emissions from hazardous waste incineration. The comment provided new data on both the levels of PCB waste generated in 1990 and data on the percentage of this amount that was incinerated. The draft report had assumed that 100% of the PCB waste was incinerated. The commenter's data stated that 37% would be a more accurate figure to use for an emissions calculation.	The data provided by the commenter were evaluated and found to be better information than was previously used to determine emissions from this category. These data were incorporated into the final 112(c)(6) PCB emission estimate for hazardous waste incineration.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
9	One commenter indicated that the number of chlor-alkali production facilities should be revised, and the national mercury emissions from this source category should be revised based on data provided.	The reported number of chlor-alkali production facilities and the national mercury emissions estimates shown for this category were revised based on supporting data provided by the reviewer.
10	One commenter suggested that the POM emission factors used for ferroalloy manufacturing sealed and semi-sealed furnaces be revised to account for the fact that all furnaces had scrubbers and flare stacks.	The emission factors national emission estimates were revised to account for emission reductions that occur due to scrubbers and flare stacks.
11	One commenter stated that the 7-PAH and 16-PAH emission factors for ferroalloy manufacturing open electric arc furnaces should be reviewed relative to more recent test data.	The emission factors and national emission estimates were revised based on supporting data provided by the commenter.
12	A comment was made that the reported major/area split for secondary lead should be revised based on supporting data provided.	The reported major/area source split for the secondary lead source category was revised based on supporting data provided by the commenter.
13	A comment was made that the reported major/area split for secondary copper should be revised based on supporting data provided.	The reported major/area source split for the secondary copper source category was revised based on supporting data provided by the commenter.
14	One commenter stressed that the major/area split for primary copper production is unknown at this time; MACT development work underway is evaluating facility-specific emissions.	The reported major/area split was not revised due to lack of definitive data available at this time. Footnotes were added to the report noting that MACT work currently underway will provide information in the future on the major/area split.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
15	A comment was received that stated that the reported mercury emissions for primary copper production should be revised based on data provided, and the report should note that emissions are now much lower than in 1990.	The reported mercury emissions from primary copper production were revised based on supporting data provided by the reviewer, and a footnote was added indicating that current emissions are much lower than 1990 levels.
16	One commenter suggested that the report specify the number of wood treatment/wood preserving facilities that use creosote or PCP.	The reported number of facilities using creosote and PCP was clarified based on supporting data provided.
17	The emission factors used to estimate dioxin/furan emissions from secondary copper smelters were questioned. More representative data were provided for review.	The non-representative data were removed from the report, and the supporting data provided by the reviewer were used to present 2,3,7.8-TCDD and 2,3,7,8-TCDD TEQ emissions from the one tested secondary copper facility.
18	One commenter noted that the number of secondary copper smelters should be revised based on data provided.	The reported number of secondary copper facilities was revised based on supporting data provided by the commenter.
19	One commenter recommended that if the source of emissions for a process source category is a non-process combustion source, then the reader should be directed to the combustion category.	The text was reviewed and no instances were found where non-process combustion sources were misclassified as process sources. No changes were made to the inventory report.
20	It was noted by one commenter that a data quality indicator should be provided for each national emissions estimate. .	EPA determined that a quality indicator system was not needed for the purposes of this inventory. Because of the diverse sources of data used to calculate national emissions, it was not feasible to develop a meaningful system for comparison.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
21	A commenter stated that the major/area split for naphthalene, naphthalene sulfonates, and phthalic anhydride production should be revised taking into consideration data provided by the reviewer. The same commenter also questioned whether co-located sources were considered in the determining major/area splits.	The major/area percentages in Table 2-1 of the draft report were changed as recommended, and the major and area source emission estimates in Table 3-4 were recalculated. Text was added on page 2-3 stating that co-location was considered in major/area determinations where data were available.
22	A commenter mentioned that the term "homologue" in the dioxin/furan discussion was incorrectly applied in describing various dioxin/furan species.	All instances of the use of the term “homologue” were reviewed. In several cases, it was determined that homologue was incorrectly used and it was replaced by the term “congener.”
23	One commenter requested that definitions be provided of the source categories referred to in this report, specifically chlorinated solvents production, naphthalene sulfonate production, and miscellaneous uses of naphthalene. It was also suggested by the commenter that the source category definitions should match MACT source category definitions.	Source category definitions were not provided in the inventory report because they were not deemed to be necessary given the extensive amount of published descriptions on the categories contained in primary references such as AP-42, NSPS/NESHAP background information documents (BIDs), L&E documents, etc. Matching of 112(c)(6) emission inventory source categories with MACT categories was determined to not be required for the 112(c)(6) process. The goal of the 112(c)(6) inventory was to identify as many individual contributors to emissions as possible. In several instances, the 112(c)(6) categorizations provided finer levels of resolution than do MACT classifications.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
24	A commenter challenged whether ethylene dichloride and vinyl chloride monomer manufacture were sources of POM or HCB. The commenter provided information to support the claim that they should not have been considered. The commenter also recommended that reasons be provided for suspecting that a pollutant is emitted from a given source category.	Information provided by the commenter was reviewed and it was decided to remove vinyl chloride monomer manufacture as a possible source of HCB. Ethylene dichloride manufacture was not a suspected source of POM or HCB. The basis for inclusion of a source category on the list of suspect sources was typically provided in the background documents referenced in each section of the report. Categories were indicated as suspect sources because there were either empirical data indicating them as sources or there had been a theoretical evaluation of the process indicating the possibility of emissions.
25	A commenter requested that a reference be provided for POM estimates from asphalt roofing manufacturing. The commenter pointed out that NSPS BID data should be considered for this category.	The reference used in the asphalt roofing manufacture section was the BID for the NSPS. A copy of this document was obtained from EPA staff involved with MACT work to confirm that the latest document had been used. This reference was noted to the text.
26	It was suggested by one commenter that chlorophenol manufacture should be listed as a potential source of dioxins/furans emissions.	This source category was added to the list of suspect source categories.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
27	One commenter noted that naphthalene production emissions should be correlated with the various process conditions (raw materials and reaction methods) used to manufacture the material. Additional information about the production processes used in 1990 was provided.	Currently, there are no naphthalene emission factors for the reaction processes used in this source category. The emissions estimates reported in the national inventory were limited to naphthalene storage and equipment leaks. Text was added to the final inventory report to clarify the basis and applicability of the emission estimates.
28	One commenter pointed out that there were at least six naphthalene sulfate production facilities in 1990.	The facility numbers were changed in Table 3-2 of the final report to reflect the comment.
29	One commenter argued that air oxidation of naphthalene was a process for only 13% of phthalic anhydride production in 1990. The commenter pointed out that there should be no naphthalene emissions from other parts of the phthalic anhydride production process.	Emissions calculated for phthalic anhydride production were for the storage and leakage of naphthalene used in the process. No process-based emissions were included in the national estimate. Appendix B of the final inventory report was modified to clarify the source of the emissions for this category.
30	It was noted by a commenter that the EPA had developed a model for estimating alkylated lead emissions based on the lead content of fuel used. These values should be used for lead emissions from aircraft.	The commenter was contacted and a methodology for Stage II hydrocarbon emissions from aircraft refueling was provided. The method proposed was evaluated and found to not be compatible with the alkylated lead data available for aircraft, and therefore, the model could not be used to estimate alkylated lead emissions.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
31	Another commenter noted that in the draft report it stated that 22 areas were used in the Non-road Engine and Vehicle Emissions Study (NEVES). The commenter pointed out that the 1991 NEVES covered 24 areas and the 1992 report covered 33 areas.	The non-road reference used in this report was the 1991 study which used 24 non-attainment areas. The draft inventory document contained a typographical error. Appendix A of the final report addressing non-road sources was corrected to indicate 24 areas and not 22.
32	One commenter stressed that the agricultural and construction equipment EOM emission factor has limited accuracy because it is based on a single engine test.	Language was added to Section A.33 of the final inventory report to better describe the source and limitations of the agricultural and construction equipment emission factors.
33	A commenter objected to the onroad dioxin/furan emissions factors used to develop the inventory because they were based on European automotive data. The commenter noted that there are more appropriate dioxin/furan emissions data available.	EPA's Office of Mobile Sources (OMS) and Office of Research and Development (ORD) are currently revising Agency estimates for onroad mobile dioxin/furan emissions. Information on these updating efforts was provided in the final report. The 112(c)(6) estimates for this category may change in the future pending the outcome of the OMS and ORD research.
34	One commenter recommended that additional information be provided on the limitations in using EOM as a POM surrogate for mobile sources.	Additional language was provided in Section 3.2.2 of the final inventory report concerning the limitations of EOM as a POM surrogate.
35	Another commenter objected to implications in the draft report that OMS has confidence in the comparative potency estimates. The commenter provided information to suggest that use of these estimates has increased the uncertainty in their studies.	Section 3.2.2 of the final inventory report has been modified to note OMS's concern with comparative potency.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
36	It was pointed out by one commenter that on the second page of Table 8-1, the title of the table has been mislabeled. It should be alkylated lead.	This correction made to the second page of Table 8-1 in the final inventory report.
37	A commenter questioned the statement that additional POM testing from mobile sources was needed. POM testing is not a priority due to an ORD health assessment for diesel emissions that indicated the primary health risk is due to the inert carbon core.	Section 9.1 was modified to include a brief statement that further development of POM emission factors is currently not a priority for EPA's OMS.
38	A commenter noted that in Table A-22 of the draft report, the dioxin/furan emission factors were missing. One commenter requested that a reference be given for onroad EOM emission factors. The commenter stated that if Lewtas, 1993 study data were used, then it should be noted that a limited number of older vehicles were in use which is not representative of the current fleet.	Dioxin/furan emission factors were added to Table A-22 in the final report. A reference was provided for the EOM emission factors in Table A-22, and a brief statement was added noting the observed limitations of the Lewtas, 1993 study.
39	A commenter pointed out that the 7-PAH and 16-PAH emission factors are based on the Baltimore Harbor Tunnel Study which contains several significant mistakes. The commenter recommended use instead of a more recent OMS method.	EPA/OMS was contacted to obtain corrections and improvements from the Baltimore tunnel study. The recommended improvements were obtained and incorporated into the inventory. POM national emissions were recalculated for the final inventory report using the OMS approach.
40	It was suggested by one commenter that titanium dioxide manufacture was a potential source of HCB.	This suspected source was noted in Section 9.5 of the draft report. No further action required in the final report.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
41	One commenter noted that the dioxin/furan emissions estimate for secondary aluminum production includes emissions from only one of the several processes used in producing aluminum. The commenter provided data that can be used to develop dioxin/furan emissions estimates that include the major processes involved in secondary aluminum production. The data provided by the commenter were used to develop a new dixoin/furan emissions estimate for secondary aluminum	The data provided by the commenter were used to develop a new dioxin/furan emissions estimate for secondary aluminum production. The new national estimate is more complete than the draft value because it addresses more emission processes.
42	One commenter pointed out that the activity level and dioxin/furan emission factors for municipal waste combustion shown in Table 4-1 are inconsistent with the dioxin/furan emissions estimates presented in Table 4-4.	The commenter was correct in his observation. The emission factor and activity data that were presented in the draft Table 4-1 were "back calculated" from the national estimate for this category that was obtained from the MACT development program. The national MACT estimate was based on individual facility test data and thus did not rely on an emission factor/activity data approach. The factor and activity data shown previously were determined from averages of the MACT data (i.e., national emissions/national activity figure). This process is what created the inconsistency indicated in the draft report. In the final report, these averaged data were removed from Table 4-1 and a footnote was added to the table to clarify the derivation of the national estimate for this category. As a result of the way the national estimate was derived, no overall emission factor could be provided in Table 4-1.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
43	A commenter maintained that the activity data used to estimate emissions from residential wood combustion, which was obtained from an Energy Information Administration (EIA) report, is incorrect because it was later revised by the EIA. The commenter also questioned the distribution of the activity data between conventional woodstoves and catalytic/noncatalytic woodstoves (70% and 30%, respectively) and stated that 95%/5% is a more representative split.	The new data suggested by the commenter were evaluated for use in the inventory and were found to represent improvements from the data used to determine draft estimates. The national PAH and EOM emissions estimates for residential wood combustion were recalculated using the revised activity data and the revised data on the distribution of stove types suggested by the commenter.
44	A commenter expressed his concern that PAH and EOM emissions estimates for residential wood combustion (RWC) are based on tests from only one woodstove, and the resulting data are used to estimate emissions from thousands of RWC sources.	The EPA recognizes and agrees with the commenter that some of the emissions estimates were developed using emission factors of relatively low quality that are based on a limited number of measurements. Data of this variety are used for national estimation purposes when they are the only data available. EPA is open to receiving any better or more representative data that may be available for this category for these pollutants.
45	One commenter indicated that the mercury emission factor used to estimate emissions from crematories is of poor quality and that better quality factors are available from source testing. This improved factor is more representative of the industry and should be used to determine national emissions for mercury.	The EPA evaluated the mercury emission factor by the commenter and determined that it is of better quality than the previous factor used to estimate national emissions. A revised national mercury emissions estimate for crematories was developed using the new emission factor.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
46	The commenter asserts that the dioxin/furan emissions estimates for utility coal and oil combustion are too high because the EPA did not follow Method 23 and count source sampling non-detects as zero when calculating average emission factors from test data. The commenter provided his estimates, which are based on counting non- detects as zero.	The EPA evaluated the data provided by the commenter and reviewed the methodology it used to determine the current dioxin estimates. After this review, EPA determined the average estimates were not necessarily determined in accordance with all Method 23 provisions; however, they maintain that the method used and the results produced are valid for the test data in question. The EPA approach neither significantly under- or overestimates emissions.
47	One commenter asserted that the dioxin/furan emissions estimate for cement kilns is based on unreliable and nonrepresentative data. A second similar comment stated that the EPA has not made use of dioxin/furan and mercury emissions data for hazardous waste burning cement kilns provided to them by industry as a part of the MACT development process.	These comments were provided to several groups within EPA that have assisted in the development of standards for this source category, both for hazardous waste kilns and non-hazardous waste kilns. Revised emission estimates were obtained that reflect EPA's best state of knowledge on dioxin emissions from cement kilns. The estimates EPA has prepared incorporated all of the industry comments and data received thus far. EPA has applied the industry data to develop the most representative national estimate it can. These revised national estimates are found in the final inventory.
48	One commenter stated that the number of facilities for medical waste incinerators shown in the draft report is incorrect and recommended use of a different number.	Based on the commenter's data, the number of facilities for medical waste incinerators was revised from 5,000 to 3,400.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
49	The commenter advised that the activity level indicated as being used to estimate emissions from medical waste incinerators during the MACT development program is incorrect and the number provided by the commenter should be presented in the report. Also, the emissions estimates for PAHs and PCBs, which were not obtained for the MACT program, should be recalculated using the correct activity level.	The report was revised to show the correct activity level for medical waste incinerators based on data supplied by the commenter. In addition, the PAH and PCB emissions estimates for medical waste incinerators were recalculated using the correct activity level.
50	One commenter indicated that the background information documents cited as references for medical waste incinerator information are not the most up-to-date versions of the documents and the reference citations should be revised to show these latest versions of the documents.	The appropriate references were obtained from the commenter and are cited in the final report.
51	A commenter cautioned that the emission estimates for crematories may be overestimated if the approach used for estimating emissions was the same as that used for medical waste incinerators.	The method used to estimate emissions from crematories was evaluated and it was determined that the method is not related or similar to the method used to estimate emissions from MWIs. Emissions from MWIs were estimated using the "bottom up" approach, while a “top down” approach was used to estimate emissions from crematories.
52	Three commenters noted that there is no distinction between 7-PAH, 16-PAH, and dioxin/furan emissions from cement kilns burning hazardous waste and emissions from kilns burning nonhazardous wastes, and suggested that emissions be presented separately.	The 7-PAH, 16-PAH, and dioxin/furan emissions estimates for cement kilns were revised to present individual estimates for kilns burning hazardous wastes and kilns burning nonhazardous wastes.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
53	A commenter indicated that the number of hazardous waste facilities presented in the report is incorrect and should be revised based on data provided by the commenter.	The number of hazardous waste combustors was revised according to the data provided by the commenter.
54	One commenter stated that the PAH and EOM emissions estimates for primary aluminum production do not include emissions from all the processes involved in producing aluminum and the data that are used are not the most representative available. The commenter provided data that are more representative than the original data and that include emissions from all processes involved in producing aluminum that are significant emission sources.	The PAH and EOM emissions estimates presented in the report were revised based on the data provided by the commenter.
55	One commenter stated that they were not aware that there are PAH emissions data available for nonhazardous waste cement kilns.	The PAH emissions data used to develop the estimate presented in the report were obtained from a document prepared for EPA's Office of Solid Waste (OSW). The report contains emissions data for both hazardous waste and nonhazardous waste kilns.
56	One commenter indicated that lime manufacturing is a source of dioxin/furan emissions but there are no emissions data available that can be used to develop an emissions estimate.	The report was revised to include lime manufacturing in the list of suspected dioxin/furan emission sources, but for which there were no available data on which to base national emission estimates.
57	One commenter stated that several of the categories identified in the mercury report section as potential emissions sources actually no longer emit mercury.	The categories of paint, pigments, and oils usage were removed from the final report as potential mercury sources based on the comment.

Table 1. Summary of External Review Comments on the Draft 112(c)(6) Emissions Inventory and EPA Responses (Cont.)

Comment No.	Comment Summary	Comment Response
58	A commenter suggested that natural and reentrainment sources should be listed in the report as potential sources of mercury emissions, but for which there are no data to develop national emission estimates.	The report was revised to include "natural sources (oceanic, terrestrial, vegetative)" in the list of potential sources of mercury emissions that could not be quantified on a national basis.
59	One commenter stated that naphthalene emissions for Gasoline Distribution (Stages I and II) were overestimated based on data contained in the gasoline marketing NESHAP estimates.	The draft report estimates were revised to reflect the naphthalene content of gasoline specified in the comments. Additionally, the major/area source allocations were revised to be consistent with the NESHAP information. The commenter's information on emission levels was not completely appropriate since the data provided were predicated on a base year different than 1990.